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Attorney for Defendant
MEDTRONIC, INC., COVIDIEN, LP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ANNETTE S. RUIZ

Plaintiff,

v.

MEDTRONIC, INC., COVIDIEN, LP

Defendants.

) Case No. 2:24-cv-00489-DB

) **JOINT STIPULATION AND**
) **ORDER FOR EXTENSION OF**
) **TIME FOR PLAINTIFF TO FILE**
) **OPPOSITION TO MOTION TO**
) **DISMISS AND FILE AMENDED**
) **COMPLAINT**

The undersigned parties, on behalf of their respective clients, hereby stipulate as follows:

1. Plaintiff ANNETTE S. RUIZ is represented by Steven Schultz of Schultz Law Group, PC.

2. Defendants MEDTRONIC, INC. and COVIDIEN, LP are represented by David Polyakov and Edward B. Gaus of Shook, Hardy & Bacon, LLP.

1 3. On November 20, 2023, Plaintiff filed her Complaint for Damages alleging
2 causes of actions for Products Liability and Strict Liability in the Sacramento County
3 Superior Court.

4 4. On February 16, 2024, Defendants filed a Notice of Removal to the above-
5 referenced court.

6 5. On February 23, 2024, Defendants filed a Motion to Dismiss in the above-
7 referenced court.

8 6. Plaintiff's Opposition to Motion to Dismiss is due to be filed March 8, 2024.

9 7. Plaintiff and Defendants, by and through their counsel of record, stipulate to
10 a 45-day extension of time in order for Plaintiff to file her Opposition to the Motion to
11 Dismiss.

12 8. Further, Plaintiff and Defendants, by and through their counsel of record,
13 stipulate to a 45-day extension of time in order for Plaintiff to file a First Amended
14 Complaint.

15 9. The deadlines for the Opposition to the Motion to Dismiss and the First
16 Amended Complaint are now April 22, 2024.

17 IT IS SO STIPULATED.

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1 DATED: March 7, 2024

SCHULTZ LAW GROUP, PC

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3
4 By /s/ Steven H. Schultz

STEVEN H. SCHULTZ

Attorney for Plaintiff ANNETTE RUIZ

6
7 DATED: March 7, 2024

SHOOK, HARDY & BACON, LLP

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9
10 By /s/ David Polyakov

DAVID POLYAKOV

EDWAD GAUS

Attorneys for Defendants

MEDTRONIC, INC. and

COVIDIEN, LP

14 I hereby attest that the non-filing party has consented to the use of signatures on this
15 document indicated by the conformed signature (/S/) within this e-filed document.
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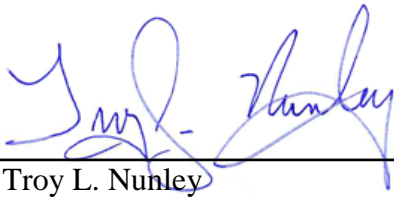
ORDER

GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED that the parties' stipulation to extend the time for Plaintiff to file her Opposition to Defendants' Motion to Dismiss is granted. The Opposition to Defendants' Motion to Dismiss is due April 22, 2024.

IT IS FURTHER ORDERED that Plaintiff's First Amended Complaint is due April 22, 2024.

IT IS SO ORDERED.

DATED: March 8th, 2024



Troy L. Nunley
United States District Judge